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6 *Attorneys for Relator STF, LLC*

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA *ex rel.* STF,  
11 LLC, an organization; STATE OF  
CALIFORNIA; *ex rel.* STF, LLC, an  
12 organization,

13 Plaintiffs,

14 v.

15 VIBRANT AMERICA, LLC, a Delaware  
limited liability company,

16 Defendants.  
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**Case No. 3:16-cv-02487-JCS**

**JOINT UPDATED CASE MANAGEMENT  
CONFERENCE STATEMENT AND  
REQUEST FOR CONTINUANCE**

Date: December 10, 2021

Time: 2:00 p.m.

Judge: Hon. Joseph C. Spero

**JOINT UPDATED CASE MANAGEMENT CONFERENCE STATEMENT:**  
**REQUEST FOR CONTINUANCE**

Relator STF, LLC (“Relator”), and Vibrant America, LLC (“Vibrant” or “Defendant”), submit this Joint Updated Case Management Conference Statement and Request for Continuance.

Since the Parties’ last update to the Court, the Parties have received final approval of the settlement from the United States Department of Justice (DOJ), and the settlement as to the federal False Claims Act claims has been fully executed. The Parties solely await final approval of the settlement by the California Department of Insurance (CDI).<sup>1</sup> CDI has indicated that approval has been delayed due to a personnel change at the top of its management team, but that approval is expected within a matter of days or weeks.

Accordingly, the Parties respectfully request that the December 10, 2021 Case Management Conference be continued for another approximately 60 days, or at the Court’s convenience.

Dated: December 3, 2021

**COTCHETT, PITRE & McCARTHY LLP**

By: /s/ Justin T. Berger  
JUSTIN T. BERGER  
BETHANY M. HILL

*Attorneys for Relator*

Dated: December 3, 2021

**FOLEY & LARDNER LLP**

By: /s/ Lori A. Rubin  
LORI A. RUBIN

*Attorney for Defendant Vibrant America, Inc.*

Dated: December 3, 2021

**SSL LAW FIRM LLP**

By: /s/ Thomas S. Brown  
THOMAS S. BROWN

*Attorney for Defendant Vibrant America, Inc.*

<sup>1</sup> The California Attorney General has already filed a Notice of Consent to Dismissal (Dkt. No. 94).